

## MEMO ENDORSED

January 17, 2020

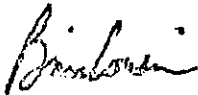
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protective order is granted, Defendants do not propose any testimony or the presentation of additional evidence at the PI Hearing other than what has already been submitted to the Court.

Therefore, in order to allow the parties and the Court to focus on the critical threshold legal issues of arbitrability and jurisdiction, it is in the interests of judicial economy and efficiency to stay all expedited discovery pending rulings on those issues, including the discovery Defendants recently served to avoid getting caught flat-footed in the event discovery proceeds in this matter.

We have spoken with Plaintiff's counsel regarding discovery issues, and the parties have been unable to reach agreement to stay discovery until the Court resolves the Defendants' pending motions. Given the discovery requests served by the parties, including requests for Rule 30(b)(6) depositions on both sides that include extensive topics and may require multiple witnesses, as well as voluminous document requests, Defendants respectfully request a telephonic conference with the Court at the Court's earliest opportunity. We are available at Your Honor's convenience to discuss this matter.

Respectfully submitted,



Brian S. Cousin

Plaintiff is to respond  
to this letter by  
Tuesday, 1/21/2020.

cc: Eric Savage, Esq. (via email: [esavage@littler.com](mailto:esavage@littler.com))

SO ORDERED

  
KENNETH M. KARAS U.S.D.J.

1/17/20

**McDermott  
Will & Emery**